UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOHN BRIDGELAL and WILKINS BELLAIRD Individually and on Behalf of All Others Similarly Situated,	: ECF CASE
Plaintiffs,	: CV 15-3571 (ADS) (AKT)
- against -	:
NY RENAISSANCE CORP., DAN PIRVULESCU and MONIQUE DELACROIX,, Jointly and Severally,	:
Defendants.	:

DECLARATION OF MONIQUE DELACROIX IN OPPOSITION TO MOTION TO CONDITIONALLY CERTIFY A FAIR LABOR STANDARDS ACT COLLECTIVE ACTION AND AUTHORIZE NOTICE TO BE ISSUED TO ALL PERSONS SIMILARLY SITUATED

Monique Delacroix, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am the president of Defendant NY Renaissance ("NYR"), and am also named individually in this action.

2. I make this declaration in opposition to the motion of Plaintiffs John Bridgelal and Wilkins Belliard individually and on behalf of others similarly situated, ("Plaintiffs"), seeking an order from the Court to conditionally certify a conditional collective action against Defendants under the Fair Labor Standards Act (the "FLSA") and to authorize that notice be sent to other employees similarly situated.

3. NYR was formed on February 23, 2012 but did not have employees until late July of 2012. NYR's payroll records show that its first employees started work

around July 23, 2012. Additionally, NYR is a small company, and has relatively few employees.

4. NYR provides its services as a subcontractor for construction projects. It does not own or control these job sites. Thus, NYR's employees mostly provide their services at job sites that NYR neither owns, nor controls. In fact, NYR is sometimes subcontracted by other subcontractors to perform work at a job site.

5. It would be unduly burdensome to require NYR to post notices at all job sites, because NYR would have to first obtain permission from the general contractors and/or owners of the site locations. Moreover, this task would complicated by the fact that on many sites, NYR is not in direct contact with the individual or entity with whom it would have to obtain permission.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 2, 2016, New York, New York.

MONIQUE DELACROIX

WENDY A. JAKLITSCH
Notary Public, State of New York
No. 01JA6141258
Qualified in Nassau County
Commission Expires February 21, 2018